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Counsel to Debtors,  
*Mark and Lisa Ranucci*  
By: Brian G. Hannon, Esq.  
BH-3645

	:	UNITED STATES BANKRUPTCY COURT
In re:	:	FOR THE DISTRICT OF NEW JERSEY
	:	TRENTON VICINAGE
MARK RANUCCI and	:	
LISA RANUCCI	:	
	:	Chapter 13
Debtor.	:	Case No. 18-23067 (MBK)
	:	Hearing Date: 5/10/2023 @ 9:00 A.M.

**CERTIFICATION IN SUPPORT OF DEBTORS'  
OPPOSITION TO THE TRUSTEE'S CERTIFICATION OF DEFAULT**

Brian G. Hannon, Esq. certifies as follows:

1. I am a partner of Norgaard O'Boyle & Hannon, counsel to the Debtors in the above-referenced matter. I write this Certification in opposition to the Standing Trustee's Motion for an Order Dismissing this case.

2. The Debtors' plan was confirmed on July 17, 2019 upon the entry of an Order bearing Docket # 89 (the "Confirmation Order"). Pursuant to the Confirmation Order, the Debtors were to make 55 payments in the amount of \$175.00 and 5 lump sum payments as follows:

- a. \$43,500.00 on or before 1/1/2019 (the "First Lump Sum Payment");
- b. \$56,155.00 on or before 1/1/2020 (the "Second Lump Sum Payment");
- c. \$43,500.00 on or before 1/1/2021;
- d. \$43,500.00 on or before 1/1/2022; and

e. \$43,500.00 on or before 1/2/2023.

3. The last lump sum came due on January 2, 2023. As disclosed in the Debtor's plan, the lump sum payments are being made by a third party. After discussions with said third party, the lump sum of \$43,500 was wired to my attorney trust account. My office cut a check for \$43,500.00 on March 29, 2023, and sent same to the trustee.

4. Upon application of the \$43,500 payment, the Debtors will be \$200.00 ahead on their trustee payments.

5. For the aforementioned reason the Standing Trustee's certification of default for an order to dismiss this petition should be denied accordingly.

I certify that the foregoing statements are true. I am aware that if the foregoing statements are willfully false, I am subject to punishment.

Dated: 3/29/2023

/s/ Brian G. Hannon  
Brian G. Hannon, Esq.